



## ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

### RESPONSIVENESS SUMMARY TO COMMENTS RECEIVED DURING PUBLIC NOTICE For Proposed Air Quality Control Permit Number 1000160

**El Paso Natural Gas Company, San Simon Compressor Station**  
**Begin Public Notice : November 5, 1997**  
**End Public Notice : December 8, 1997**

All of the following comments were submitted by El Paso Natural Gas Company.

#### **TABLE 1 : Summary of Permit Requirements**

*Comment 1: SO<sub>x</sub> Monitoring/Recordkeeping for P1, P2, P3 - The "< 0.017 wt% (5gr/scf) should be replaced with "< 0.8 percent by weight" since the sulfur dioxide standard in R18-2-719.J references 0.8 weight percent.*

*Response:* EPNG is required under FERC agreement to limit sulfur content in natural gas to less than 5 gr/scf which is equivalent to 0.017 weight percent. Our regulations require EPNG to limit the sulfur content to less than 0.8 weight percent. FERC stipulated 0.017% was specified as a reference. This has been removed to make the table consistent with the statements in permit conditions II.A.1 and II.B.1 of Attachment "B". The table has been updated to reflect this change.

*Comment 2: NO<sub>x</sub>, CO, VOC, HAPs Testing frequency/Methods: The language should be revised to state as follows:*

"One time for NO<sub>x</sub> and CO on each turbine within six months of permit expiration, if turbine unit is operated for 15 cumulative days, using Method 20 and 10."

*Response:* ADEQ agrees with EPNG. The above language has been added to the permit.

*Comment 3: Opacity: The table should include exemption for the first 10 minutes after cold starting as noted in R18-2-719.E.*

*Response:* ADEQ agrees with EPNG. The exemption for the first 10 minutes after cold starting has been added to the table.

*Comment 4: F.1.b - “Unused open areas” - Remove “Monthly status of unused open areas” and keep only “Dates fresh vegetation added” so that it is consistent with Attachment B.II.B.1.b.*

*Response:* The requirement to record monthly status of open areas has been removed from the summary table. This change makes the table consistent with the permit condition II.B.1.b in Attachment B.

*Comment 5: F3. - Spray Painting. The language in parantheses should be after “MSDS of paints used” so that it will be consistent with Attachment B.II.C.2.a.*

*Response:* The language in parantheses has been moved to follow “MSDS of paints used” in the summary table to be consistent with the permit condition II.C.2.a. in Attachment B.

*Comment 6: F4. a. and b. Mobile Sources Monitoring/Recordkeeping - The language should be revised as follows:*

*Record of all emissions related maintenance activities performed on Permittee’s roadway and site cleaning machinery stationed at the facility.*

*Response:* The table has been modified to include the language “stationed at the facility” in F4.b. In addition, F4.a. has been changed to read as follows:

Record of all emissions related maintenance activities performed on Permittee's off-road machinery **stationed at the facility.**

## **ATTACHMENT A**

*Comment 7: II. Compliance with permit conditions:*

*A. The first sentence of this provision should be reworded to conform to the permit shield provisions of R18-2-325:*

*The Permittee shall comply with all conditions of this permit, which sets forth all applicable requirements of Arizona’s air quality statutes and the air quality rules.*

*The existing language could be read as requiring the Permittee to comply with “all applicable requirements” which contradicts the purpose of a Class I permit.*

*Response:* ADEQ agrees with EPNG. This change has been made in the permit condition.

*Comment 8: XI. Permit Deviation Reporting*

*EPNG has a number of concerns with this condition. First, R18-2-310 provides for an affirmative defense if the notification requirements set forth in R18-2-310(C) and repeated in Attachment “A”, Condition XI are met, but ADEQ has construed the provision in the permit as “mandating” excess emission reports whether the affirmative defense is claimed or not. This interpretation is inconsistent with how R18-2-310 has been interpreted in the past. ADEQ should clarify that the excess emissions reports in Subsection A are NOT required unless the affirmative defense is claimed.*

*Until EPA approves R18-2-310 into the Arizona SIP and/or the Title V program, all of the proposed conditions (Subsections A, B, C, and new Section D) should be designated in the permit as “NOT FEDERALLY ENFORCEABLE”.*

*R18-2-310 (A) provides for an affirmative defense if the notification requirements set forth in R18-2-310(C) and repeated in Attachment “A”, Condition XI are met. EPNG understands that EPA is currently taking the position that R18-2-310 is not approvable as part of ADEQ Title V program. Nevertheless, R18-2-310 is part of Arizona law and EPNG believes that it should be incorporated into the permit. Accordingly, EPNG proposes the following new Subsection D:*

- D. Upon approval of R18-2-310 into the Arizona SIP or ADEQ Title V program, unless the provision of Attachment “A”, XI.A.5. apply, it shall be an affirmative defense if the permittee has complied with the reporting requirements set forth in Subsection A of this condition in a timely manner and has demonstrated all of the following:
1. The excess emissions resulted from a sudden and unavoidable breakdown of the process or the control equipment, resulted from unavoidable conditions during the startup or shutdown, resulted from unavoidable conditions during an upset of operations, or that greater or more extended emissions would result unless scheduled maintenance is performed;
  2. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
  3. Where repairs were required, such repairs were made in an expeditious fashion when the applicable emissions were being exceeded and off-shift labor and overtime were utilized where practical to insure that such repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the Permittee must satisfactorily demonstrate that such measures were impractical;

4. The amount and duration of excess emissions ( including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
5. All feasible steps were taken to minimize the impact of the excess emissions on potential violations of the ambient air quality standards;
6. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and;
7. During the periods of excess emissions there were no measured violations of the ambient air quality standards which could be attributed to the facility.

*Response:* For some reason there has been some misunderstanding regarding the AAC R18-2-310(C) reporting requirements. We have been trying to clarify the reporting requirements under R18-2-310(C) not only with EPNG but other Permittees as well. The excess emissions reports are required under AAC R18-2-310(C) regardless of whether the Permittee wants to claim affirmative defense or not. If there is a case of excess emission, then the Permittee needs to report it. There is no ambiguity involved either in the interpretation above or in the intent of the rule. The Permittee may also claim affirmative defense under AAC R18-2-310.A if the reporting requirements of AAC R18-2-310.C and all of the conditions of AAC R18-2-310.A were met.

As part of its interim approval of ADEQ's Title V program (October 30, 1996, Federal Register, Page no. 55910) EPA has granted ADEQ the authority to implement its Title V program according to the regulations that have received interim approval including the AAC R18-2-310 excess emissions affirmative defense provision. Thus, Subsections A, B, and C of condition XI of Attachment A are approved under federal Part 70 program and are federally enforceable.

Pending further resolution and final action on AAC R18-2-310 by the EPA, condition XI will continue to be in effect *status quo*. Upon final action, the permit will be reopened to reflect the appropriate changes as required.

This comment does not result in a change in the permit condition.

*Comment 9: XVII. Testing Requirements*

*EPNG understands that normal rated capacity means capacity reflecting ambient temperature, pressure and humidity conditions present during the emissions test. EPNG also understands that ADEQ's inclusion of the provision allowing for performance testing at lower operational rates with the Director's prior written*

*approval acknowledges that at certain times there may be insufficient natural gas throughput to operate at “normal rated capacity” in which case testing may be deferred or conducted at a lower operating rate. While EPNG would prefer that ADEQ include permit language defining normal rated capacity as capacity reflecting ambient conditions and available pipeline capacity, EPNG is willing to accept ADEQ’s explanation of its intent in the Technical Review Document and response to these comments.*

*Response:* ADEQ is aware that EPNG may or may not operate the turbine(s) at their normal rated capacity, during the life of the permit. Given the unpredictability in operations, it was decided that the optimal course of action would be to obtain written approval from the Director at the time of testing, if the testing is to be performed at a lower rate. This comment does not result in a change in the permit language.

## **ATTACHMENT B**

### *Comment 10: I. Emission Limitations (I.B.1.b.3)*

*EPNG understands that dust suppressants or wetting agents are to be used during construction operations, repair operations, and demolition activities directly associated with earth moving or excavation activities likely to generate excessive amounts of particulate matter and not for any construction operation, repair operation, or demolition activity. EPNG requests ADEQ clarification if this is not ADEQ’s intent.*

*Response:* The intent of condition I.B.1.b.3 of Attachment “B” of the permit is to regulate excessive emissions of particulate matter. The intent of this condition is further clarified by the wording of condition I.B.1.b which is as follows: “Permittee shall employ the following methods to *prevent excessive amounts of particulate matter from becoming airborne*.”. Those construction, repair, or demolition operations that have no associated particulate matter emissions are not subject to the requirements of condition I.B.1.b.3 of Attachment “B” of the permit. This comment does not result in a change in the permit language.

### *Comment 11: I. Emission Limitations (I.C.1)*

*The proposed permit language limits “good modern practices” to wet blasting and effective enclosures whereas the rule simply gives wet blasting and effective enclosures as examples of good modern practices. EPNG requests that “Good modern practices include:” be changed to “Examples of good modern practices include:”.*

*Response:* Although the rule gives wet blasting and effective enclosures as examples of good modern practices, ADEQ believes that limiting good modern practices to the two mentioned

practices would enhance the enforceability of the permit. EPNG has the option of submitting other alternatives for ADEQ to evaluate and add to the permit through a permit revision. There is no change in the permit condition.

*Comment 12: Emissions Limitations*

*On occasion, EPNG personnel will need service air conditioners at remote compressor stations. Therefore, we need to add #5. When contracting air conditioner maintenance service, the contractor will ensure that requirements of 40 CFR 82-Subpart F are met. Since some parts of Subpart F are applicable only to manufacturers or importers of recycling equipment or other particular situations, the language below notes that only “applicable” requirements must be met by EPNG.*

**5. Nonvehicle Air Conditioner Maintenance and/or Services**

*When Permittee’s employees are servicing applicable appliances, the permittee shall comply with applicable requirements of 40 CFR 82- Subpart F.*

*Response:* The Permittee had originally included air conditioning servicing, expected to be performed by outside contractors, in the permit application. During the public comment period, EPNG decided that they might perform such activities themselves and requested for the inclusion of applicable requirements of 40 CFR 82 - Subpart F in the permit. The following has been added as condition I.C.5 in Attachment “B” of the permit:

**5. Nonvehicle Air Conditioner Maintenance and/or Services**

**The Permittee shall comply with the applicable requirements of 40 CFR 82 - Subpart F (Protection of Stratospheric Ozone - Recycling and Emissions Reduction).**

[40 CFR 82, Subpart F]

*Comment 13: Monitoring and Recordkeeping (II.A.1)*

*EPNG understands that we need to maintain an updated copy of the extracted portion of the FERC approved tariff which pertains to the sulfur content and lower heating value of the fuel and not the entire FERC tariff which is a voluminous and periodically edited document. EPNG requests ADEQ clarification if this is not ADEQ’s intent.*

*Response:* The intent of condition II.A.1 of Attachment “B” of the permit is to monitor particulate and sulfur dioxide emission standards only. The language has been modified to further clarify that tariff information relating only to lower heating value and fuel sulfur content needs to be kept on file. The modified language is reproduced below:

Permittee shall monitor daily, the sulfur content and lower heating value of the fuel being combusted in the gas turbine. This requirement may be complied with by maintaining a copy of **that part of** the Federal Energy Regulatory Commission (FERC) approved Tariff agreement that limits transmission to pipeline quality natural gas of sulfur content less than 0.8 percent by weight and having a heating value greater than or equal to 967 Btu/ft<sup>3</sup>.

*Comment 14: Monitoring and Recordkeeping (II.B.1)*

*For a more streamlined permit, EPNG suggests that ADEQ consider combining the identical provisions of II.B.1.c through II.B.1.i. EPNG proposes*

- c. Dates on which any of the activities listed in I.B.1.b.(3) through (9) were performed, and control measured adopted.

*Response:* The current format of condition II.B.1 of Attachment “B” of the permit will be retained since it enhances the readability of the permit.

*Comment 15: Monitoring and Recordkeeping (II.C.1)*

*A record of the abrasive blasting project requires a log in ink. EPNG requests that “in ink” be removed since it implies that a handwritten rather than a printed electronic log must be kept. Many other agencies such as DOT and Arizona Corporation Commission accept electronic recordkeeping. Since EPNG must comply with the every 6 month compliance certification, it is our duty to assure that the records are accurate and complete.*

*Response:* The language of condition II.C.1 of Attachment “B” of the permit has been modified as follows:

**“Each time an abrasive blasting project is conducted, the Permittee shall log in ink or in an electronic format, a record of the following:....”**

*Comment 16: Monitoring and Recordkeeping (II.C.2.a)*

*A record of the spray painting project requires a log in ink. EPNG requests that “in ink” be removed since it implies that a handwritten rather than a printed electronic log must be kept. Many other agencies such as DOT and Arizona Corporation Commission accept electronic recordkeeping. Since EPNG must comply with the every 6 month compliance certification, it is our duty to assure that the records are accurate and complete.*

*Response:* The language of condition II.C.2.a of Attachment “B” of the permit has been modified as follows:

“Each time an spray painting project is conducted, the Permittee shall log in ink or in an electronic format, a record of the following:....”

*Comment 17: Monitoring and Recordkeeping (II.C.3)*

*EPNG continues to assert that there is no strict correlation between maintenance activities and exceeding the 40 % opacity standard for mobile sources. EPNG objects to the current provision to the extent that it seeks to require recordkeeping of mobile sources that are not permanently or semi-permanently maintained at this station. EPNG understands that equipment brought in from other areas of the system must comply with the mobile source requirements of R18-2-802 and R18-2-804(a), but mobile equipment stationed elsewhere should not be subject to site-specific permit requirements. EPNG has mobile sources located in El Paso, Gallup, and other locations within the EPNG system. The current permit language requires a record of maintenance activities of Permittee’s equipment. “Permittee’s equipment” could mean equipment stationed in El Paso or other EPNG locations that would never be used at the permitted facility. Therefore, EPNG requests that the permit language be revised as follows:*

The Permittee shall keep a record of all emissions related maintenance activities performed on Permittee’s mobile sources stationed at the facility as per manufacturer’s specifications.

*Response:* ADEQ agrees with EPNG. The language has been changed to include “**stationed at the facility**”.

*Comment 18: Monitoring and Recordkeeping*

*On occasion, EPNG personnel will need service air conditioners at remote compressor stations. Therefore, we need to Add #5. When contracting air conditioner maintenance service, the contractor will ensure that requirements of 40 CFR 82-Subpart F are met. Since some parts of Subpart F are applicable only to manufacturers or importers of recycling equipment or other particular situations, the language below notes that only “applicable” requirements must be met by EPNG.*

5. Nonvehicle Air Conditioner Maintenance and/or Services

*As a means of demonstrating compliance with condition I.C.5 of this Attachment, the Permittee shall keep a record of all relevant paperwork of 40 CFR Part 82-Subpart F applicable requirements on file.*

*Response:* Please refer Comment No. 12. A condition to this effect has been added in II.C.5 of Attachment “B” of this permit.

*Comment 19: Monitoring and Recordkeeping(II.D)*

*EPNG understands that a log of all records does not preclude the use of a three ring binder or centralized file folders. EPNG requests ADEQ clarification if this is not ADEQ's intent. It is our understanding that ADEQ is contemplating a requirement to keep an index of records in a bound logbook. Recordkeeping in a bound logbook or preparing an index in a bound logbook for every job ticket, FERC tariff, and other record is unnecessary double work. Since EPNG must comply with every 6 month compliance certification, it is our duty to assure that the records are accurate and complete. The ADEQ does not specify how records must be kept. Please consider deleting the requirement for a cross index in a bound log book and bound logbook itself.*

*Response:* ADEQ wishes to clarify that a log of all records does not preclude the use of three ring binders or centralized file folders. The requirement for a cross index has not been included in the draft permit condition language. Therefore, this comment does not apply to San Simon compressor station. There is no change in the permit condition.

*Comment 20: Testing Requirements (IV.A)*

*EPNG agrees with the Technical Review Document that there are no emission limits or standards for NOx and CO for the reciprocating units at the facility. EPNG does not believe that R18-2-719 or any other applicable requirement establishes NOx and CO emission standards applicable to the units. Although EPNG believes there is no basis for NOx and CO testing requirements, EPNG does, however, understand ADEQ's intent in providing corroborating data to supplement the existing emissions estimates. By agreeing to this one-time test, EPNG is not conceding that any such testing is required.*

*At some EPNG locations, there is a high pressure pipeline system and low pressure pipeline system that is distinct and each system is connected to only one particular turbine unit. Therefore, if there is no means of routing the natural gas between the systems, one unit may operate while the other may not. Since the intent of the requirement is to mandate testing of a particular unit, the fifteen cumulative days should be unit specific rather than location specific.*

*The requirement to conduct a performance test if the cumulative days of operation of all engines during the permit term exceed fifteen days should be changed to read as follows:*

Permittee shall conduct one performance test on a turbine if the cumulative days of operation of the unit during the permit term exceed fifteen days.

*If the language cannot be changed to be unit specific, EPNG requests the flexibility to petition ADEQ for a reprieve from performance testing if it can be shown that the individual unit operated for less than fifteen days during the permit term. EPNG requests in the testing section that “These performance tests shall be completed within six months prior to this permit expiration.” be changed to “These performance tests shall be completed within six months prior to this permit expiration. If the unit cannot be tested within six months prior to the permit expiration, Permittee shall provide records showing the unit operated less than fifteen cumulative days of operation and any other supporting data to petition the Director for a reprieve from the performance testing requirement.” Excusing testing for units that have not operated fifteen days, even when another unit on a different line at the same facility may have operated over fifteen days, does not represent a weakening of testing requirements. As EPNG has mentioned elsewhere and ADEQ has conceded, at many EPNG facilities, there is no applicable requirement mandating testing. Although ADEQ indicated verbally that flexibility would be given at those unique locations, it would be preferable to include the optional language in the permits.*

*Response:* ADEQ agrees with EPNG and recognizes the physical limitations imposed by the high pressure and low pressure pipeline systems. The language of IV.A has been modified as follows:

**"Permittee shall conduct one set of performance tests on each turbine that is operated for more than 15 days during the permit term. These performance tests shall be completed within six months prior to this permit expiration. Each set of performance tests shall include all of the pollutants listed in Section IV.B of this Attachment."**

## **ATTACHMENT C**

*Comment 21: EPNG requests that the following additional item be added to the list of “requirements specifically identified as applicable”:*

*40 CFR 82 - Protection of Stratospheric Ozone - Subpart F - Recycling and Emissions Reduction*

*Response:* Please see Comment No. 12. This item has been added to the relevant list in Attachment C of the permit.

## **ATTACHMENT D**

*Comment 22: The Date of Manufacture in the table should be changed to “Date of Installation/Date of Manufacturer” since the manufacture date is unknown.*

*Response:* The column heading has been changed to Date of Installation/Date of Manufacture.

**ATTACHMENT E**

*Comment 23: The draft Wenden permit has Item 33 - Routine startups and shutdowns. Please add this item to the list of insignificant activities.*

*Response:* Item 33 has been added to the permit.